

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

MAPLEBEAR, INC., D/B/A	§	
INSTACART,	§	
	§	CIVIL ACTION NO. 25-CV-00137-
Plaintiff,	§	MTS
	§	
v.	§	
	§	<u>JURY TRIAL DEMANDED</u>
FALL LINE PATENTS, LLC,	§	
	§	
Defendant.	§	

**Declaration Of Matthew J. Antonelli In Support Of
Fall Line's Motion To Transfer To The Eastern District Of Texas
Under The First-To-File Rule**

I, Matthew J. Antonelli, am a member of the bars of the states of Texas and New York and have been admitted *pro hac vice* to this Court for the purpose of this action. I am one of the attorneys representing Fall Line Patents, LLC. I make this declaration based on my personal knowledge and, if called as a witness, I could and would competently testify to the matters set forth herein.

1. Attached hereto as Exhibit 1 is a true and correct copy of U.S. Patent No. 9,454,748.

2. Attached hereto as Exhibit 2 is a true and correct copy of U.S. Patent No. 7,822,816.

3. Attached hereto as Exhibit 3 is a true and correct copy of a report generated by Pacer based on a search I conducted for cases filed by MacroSolve.

4. Attached hereto as Exhibit 4 is a true and correct copy of M. Willaims *et al.*, “Patent Pilot Program: Five Year Report” (FJC April 2016).

5. Attached hereto as Exhibit 5 is a true and correct copy of portions of Form 10-K of Drone Aviation Holding Corp for the fiscal year ended December 31, 2014, which I downloaded from the SEC’s website.

6. Attached hereto as Exhibit 6 is a true and correct copy of assignment records that were recorded with the Patent and Trademark Office.

7. Attached hereto as Exhibit 7 is a true and correct copy of a report generated by Pacer based on a search I conducted for cases filed by Fall Line.

8. Attached hereto as Exhibit 8 is a true and correct copy of Dobrusin Law Firm, “The What, Why, and How of Continuation Patent Applications,” which I downloaded from the Dorbusin Law Firm’s website.

9. Attached hereto as Exhibit 9 is a true and correct copy of Fall Line’s complaint against Sprouts, which Fall Line filed in the Eastern District of Texas on November 25, 2024.

10. Attached hereto as that 10 is a true and correct copy of Fall Line's complaint against Aldi, which Fall Line filed in the Eastern District of Texas.

11. Attached hereto as Exhibit 11 is a true and correct copy of interrogatory responses served by Sprouts on Fall Line in Consolidated Case No. 5:24-cv-167-RWS, pending in the Eastern District of Texas.

12. Attached hereto as Exhibit 12 is a true and correct copy of interrogatory responses served by Aldi on Fall Line in Consolidated Case No. 5:24-cv-167-RWS, pending in the Eastern District of Texas.

13. Attached hereto as Exhibit 13 is a true and correct copy of the Sprouts Defendants' Opposed Motion To Transfer To The Northern District Of Oklahoma, along with Exhibit 3 to that motion, which were filed in Case No. 5:24-cv-182-RWS, pending in the Eastern District of Texas.

14. Attached hereto as Exhibit 14 is a true and correct copy of the Aldi Defendants' Opposed Motion To Transfer To The Northern District Of Oklahoma, along with Exhibit 3 to that motion, which were filed in Case No. 5:24-cv-172-RWS, pending in the Eastern District of Texas.

15. Attached hereto as Exhibit 15 is a true and correct copy of a redacted version of Fall Line's Opposition To Sprouts And Aldi's Motions To Transfer, which Fall Line filed in Case No. 5:24-cv-182-RW and Case No. 5:24-cv-172-RWS, both pending in the Eastern District of Texas.

I declare under penalty of perjury under the laws of the United States
of America that the foregoing is true and correct. Executed on June 16, 2025.

/s/ Matthew J. Antonelli
Matthew J. Antonelli

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of June 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Matthew Antonelli
Matthew Antonelli